

**LEE LITIGATION GROUP, PLLC**

30 EAST 39<sup>TH</sup> STREET, SECOND FLOOR  
NEW YORK, NY 10016  
TEL: 212-465-1180  
FAX: 212-465-1181  
[INFO@LEELITIGATION.COM](mailto:INFO@LEELITIGATION.COM)

WRITER'S DIRECT: 212-465-1188  
[cklee@leelitigation.com](mailto:cklee@leelitigation.com)

May 29, 2014

**Via ECF**

The Honorable A. Kathleen Tomlinson, U.S.M.J.  
U.S. District Court, Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722-9014

Re: Martinez, et al. v. Ayken, Inc. et al.  
Case No. 13-cv-7411

Dear Judge Tomlinson:

We are counsel to Plaintiffs and submit this letter jointly with Defendants.

We write to inform the Court that the parties have agreed to engage in mediation in the above-referenced matter to see if this matter may be resolved on a class-wide basis. The parties will be utilizing the services of a third party mediator, Richard Mormile, and the mediation is scheduled for June 30, 2014.

The parties jointly request that the litigation be put on hold until a date following the mediation, and that all dates and deadlines, including but not limited to Plaintiffs' deadline to file their Reply to conditional collective certification (currently due May 30, 2014), be adjourned accordingly. Since discovery in this matter has been ordered to be completed by October 31, 2014, the parties believe that even if the mediation is unsuccessful, discovery should be able to be completed by such date.

We thank the Court for its consideration.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee

cc: all parties via ECF